

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11
	:
DOWLING COLLEGE,	:
f/d/b/a DOWLING INSTITUTE,	: Case No. 16-75545 (REG)
f/d/b/a DOWLING COLLEGE ALUMNI	:
ASSOCIATION,	:
f/d/b/a CECOM,	:
a/k/a DOWLING COLLEGE, INC.,	:
	:
Debtor.	:
-----X	

**STIPULATION AND ORDER EXTENDING TIME TO
FILE NOTICE OF REMOVAL OF STATE COURT LITIGATION**

WHEREAS, prior to the Petition Date (as defined herein), Sans Technology, Inc. commenced a lawsuit against Dowling College (“Dowling” or the “Debtor”) captioned *Sans Technology, Inc. v. Dowling College*, Index No. 613595/2015, in the Supreme Court of the State of New York, Suffolk County (the “State Court Litigation”); and

WHEREAS, on November 29, 2016 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Eastern District of New York; and

WHEREAS, as a result of the automatic stay provisions of section 362(a) of the Bankruptcy Code, the State Court Litigation is currently stayed; and

WHEREAS, pursuant to Rule 9027 of the Federal Rules of Bankruptcy Procedure, the deadline to file a notice of removal of the State Court Litigation to federal court is February 27, 2017 (the “Removal Deadline”).

NOW, THEREFORE, IT IS STIPULATED AND AGREED AS FOLLOWS:

1. The Removal Deadline is extended through and including May 30, 2017.

2. This Stipulation may be executed in one or more counterparts, each of which shall be deemed an original but all of which together shall constitute one and the same instrument. Any signature delivered by a party via telecopier transmission shall be deemed an original signature hereto.

Dated: New York, New York
February 27, 2017

Dated: North Babylon, New York
February 27, 2017

KLESTADT WINTERS JURELLER
SOUTHARD & STEVENS, LLP

WILLIAM D. WEXLER

By: /s/ Sean C. Southard
Sean C. Southard
Lauren C. Kiss
200 West 41st Street, 17th Floor
New York, New York 10036
Tel: (212) 972-3000
Fax: (212) 972-2245
Email: ssouthard@klestadt.com
lkiss@klestadt.com

By: /s/ William D. Wexler
William D. Wexler
816 Deer Park Avenue
North Babylon, New York 11703
Tel: (631) 422-2900
Email: wexlaw@optonline.net

Counsel to Sans Technology, Inc.

*Counsel to the Debtor and Debtor in
Possession*

“SO ORDERED”